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December 6, 2024

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

LETTER MOTION

**Re: Mt. Hawley Insurance Company v. Dumbarton Security Services, LLC
and Stonecrest Mall SPE, LLC
Case no.: 1:24-cv-07147-PAE
Order to Show Cause Return Date: December 10, 2024**

Dear Judge Engelmayer:

My office was recently retained to represent Stonecrest Mall SPE, LLC in the above matter. It is my understanding that there is an Order to Show Cause scheduled for December 10, 2024 to determine why the action should not be dismissed for failure to prosecute or for Mt. Hawley to file a motion for a default judgment against Stonecrest. On behalf of my client, and with the consent of counsel for Mt. Hawley and Dumbarton Security Services, LLC, we ask that the Order to Show Cause be adjourned.

It is our intention to file a motion for leave to file a late Answer. Stonecrest always intended to defend this declaratory action and believes that it has meritorious defenses. We intend to file our motion, at the latest, by the beginning of next week.

As mentioned above, Mr. Delahunt, counsel for Mt. Hawley have spoken and he consents to the extension of time for Stonecrest to file an Answer. I have also spoken with counsel for Dumbarton and she also consents to the adjournment.

No prior requests have been made for an adjournment. Thank you for your courtesies and assistance.

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Very truly yours,

GOLDBERG SEGALLA LLP

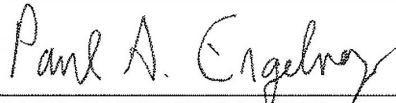
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cc:	Timothy E. Delahunt	<i>tdelahunt@delahuntpllc.com</i>
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GRANTED. The Court construes defendant Stonecrest Mall SPE, LLC's ("Stonecrest") letter as a response to its Order to Show Cause. Dkt. 17. Accordingly, the Court extends Stonecrest's deadline to answer or otherwise respond to December 10, 2024.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

December 6, 2024
New York, New York